

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN RE: :  
:   
April R. Wescott : Case No.: 20-11258(AMC)  
:   
Debtor(s) : Chapter 13

---

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY DEUTSCHE BANK NATIONAL TRUST COMPANY, et al.**

**COMES NOW**, Debtor, April R. Wescott, hereinafter referred to as “Debtor,” by and through their undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by Deutsche Bank National Trust Company, “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
5. Admitted.
6. Admitted.
7. Denied. By way of further response, on or about March 16, 2020, Debtor sent a certified check to the Movant for the amount of \$1,800.00. That certified check was then returned to the Debtor and received on April 24, 2020. Additionally, on or about May 22, 2020, the Debtor sent another certified check to the Movant in the amount of \$2,468.36 which was not returned. Lastly, on or about June 16, 2020, the Debtor sent a certified check in the amount of \$617.00 to the Movant and that check was not returned.
8. Denied.
9. Denied.

10. Denied.

11. Denied.

12. Denied.

**WHEREFORE**, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362.

Respectfully submitted,

Dated: July 1, 2020

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008